

# EXHIBIT

## G

Excerpts of Deposition of

Debra Koper

DEBRA KOPER  
SLEDGE vs. WATTS

June 10, 2015

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF TENNESSEE

3 MARY PHILLIPA SLEDGE, )  
4 et al., )  
5 Plaintiffs, )  
6 VS. ) CIVIL ACTION NO. 13-2578-STA  
7 CLEAL WATTS, III, et al., )  
8 Defendants. )

9  
10 \* \* \* \* \*

11 ORAL AND VIDEOTAPED DEPOSITION

12 OF

13 DEBRA KOPER

14 \* \* \* \* \*

15  
16  
17 ANSWERS AND DEPOSITION OF DEBRA KOPER, produced  
18 as a witness at the instance of the Plaintiffs, taken in  
19 the above-styled and -numbered cause on the 10th of June,  
20 A.D., 2015, beginning at 1:17 p.m., before Carrie del  
21 Angel, a Certified Shorthand Reporter in and for the State  
22 of Texas, in the offices of Esquire Solutions, located at  
23 1700 Pacific Avenue, Suite 1000, Dallas, Texas, in  
24 accordance with the Federal Rules of Civil Procedure and  
25 the agreement hereinafter set forth.



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A P P E A R A N C E S

FOR THE PLAINTIFFS:

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ALSO PRESENT: Mary Phillipa Sledge  
Cody Modro - Videographer

WITNESS' ADDRESS: 8926 Forest Hills Boulevard  
Dallas, Texas 75218



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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: This is the videotaped  
3 deposition of Debra Koper held in Dallas, Texas. The time  
4 is now 1:17 p.m. on June 10th, 2015. We are now on  
5 record.

6 At this time, will the counsel please  
7 introduce themselves and whom they represent, and the  
8 witness will then be sworn in.

9 MR. PHILLIPS: My name is Darrell Phillips.  
10 Together with Anthony Pietrangelo who is also present, we  
11 represent the plaintiff, Phillipa Sledge -- or one of the  
12 plaintiffs. The deponent is Debra Koper who frequently  
13 goes by Debbie Koper.

14 DEBRA KOPER,  
15 having been first duly cautioned and sworn to testify the  
16 truth, the whole truth and nothing but the truth,  
17 testified on his oath as follows:

18 EXAMINATION

19 BY MR. PHILLIPS:

20 Q. Okay. We're going to jump right in. Ms. Koper,  
21 have you ever been deposed before?

22 A. I have no clue what that means.

23 Q. Have you ever been to one of these --

24 A. No.

25 Q. -- before, a deposition?



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1 Q. Okay. To your knowledge, has he been working on  
2 these gold transactions for a long time?

3 A. Yes.

4 Q. How long would you say he's been doing it?

5 A. Probably -- that I know that he -- you know, what  
6 he was really doing, probably about six, seven years.

7 Q. Okay. And how long have you known of SK?

8 A. Probably about six, seven years.

9 Q. And have you -- and I don't remember if I asked  
10 you this, but have you met SK?

11 A. No.

12 Q. But he's been to the United States?

13 A. I have no idea.

14 Q. Did Dr. Watts ever talk to you about meeting him  
15 here in the United States in Texas?

16 A. No.

17 Q. Okay. Do you know the names of any of his other  
18 -- anybody who's invested with him other than my client,  
19 obviously?

20 A. I have.

21 Q. You have?

22 A. Yes.

23 Q. How much did you invest with him?

24 A. This was a while back. Maybe 15,000.

25 Q. \$15,000?



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1 A. Maybe.

2 Q. And this was when you were still at UPS?

3 A. Yes. Yes.

4 Q. So when would this have been? 2007?

5 A. 2007 or 2008. I cannot remember.

6 Q. And what were the circumstances that came about?

7 How did you end up doing that? Was it your idea or his  
8 idea?

9 A. It actually was my idea.

10 Q. And why did you decide to do that?

11 A. Because they were running short on money to get  
12 it over here, the gold ore, and I said, well, I can help  
13 you out with that. And then he said that, you know, in  
14 return, that it -- it could be an investment or he would  
15 pay me back.

16 Q. And which did he do?

17 A. Neither.

18 Q. Okay. So he still owes you the money?

19 A. Yes.

20 Q. I mean, to the extent that you care, he still  
21 owes you the money? You may not want it back from him.

22 A. Let's put it this way: I would not have lent him  
23 the money if I expected it -- I don't lend anybody money  
24 that I expect to pay -- be paid back.

25 Q. You don't lend people money that you --

